

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

SHANNON PEREZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants.

CIVIL ACTION NO.
SA-11-CA-360-OLG-JES-XR
[Lead Case]

UNOPPOSED MOTION TO EXTEND TIME TO FILE INITIAL ATTORNEY'S FEE APPLICATIONS

This Court's Final Judgment entered on July 24, 2019, Dkt. 1633, bifurcated the issue of attorney's fees into two steps. First, any party who seeks fees for work in this cause must file a motion for fees in which it deals with the issue of "prevailing party". Dkt. 1633, p. 2. Thereafter, if a party is determined to be a prevailing party, it may file an application for fees in conformance with WDTX Local Rule CV-7(j).

Plaintiffs' first deadline for filing the "prevailing party" portion of the motion is currently due on August 7, 2019. In light of the voluminous record in this case and due to summer travel schedules and vacations, Plaintiffs request an extension of 30 days to submit the first motion associated with the bifurcated issue of attorney's fees. The extension will not cause any undue prejudice to the Defendants and Defendants do not oppose this motion.

The Plaintiffs therefore respectfully request an order extending the time to submit motions for attorney's fees on the prevailing party issue to September 6, 2019.

DATED: August 1, 2019

Respectfully submitted,

/s/ Jose Garza
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CERTIFICATE OF CONFERENCE

I hereby certify that, on August 1, 2019, counsel for Plaintiffs conferred with counsel for Defendants regarding Plaintiffs' request to extend the time to file the initial fees motions dealing with prevailing party for 30 days. Counsel for Defendants indicated that they are unopposed to this request for an extension of time.

/s/ Jose Garza
JOSE GARZA

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of August, 2019, I electronically filed the foregoing using the CM/ECF system which will send notification of such filing to all counsel of record who have registered with this Court's ECF system.

/s/ Jose Garza
JOSE GARZA